

REMARKS

This responds to the Final Office Action dated March 16, 2011 and is in connection with an Examiner Interview conducted on Jun. 22, 2011 at 1pm EST.

Claims 1, 14, 27, and 40 are amended, no claims are canceled, and no claims are added; as a result, claims 1-50 are pending in this application.

Examiner Interview Summary

The Applicant would like to thank Examiner Thomas Dailey for the courtesy of a telephone interview conducted on Jun. 22, 2011 at 1pm EST between the Examiner and the Applicant's representative, Jim H. Salter. During the interview, the Applicant's representative discussed the scope of the pending independent claims and the cited art, particularly the Odiaka (US Pat. 6,829,347), Brawn et al. (US Pat. 7,020,718), and Naveh et al. (US Pat. 6,466,984) references. A summary of the points discussed is provided below.

Summary of Argument

A. Applicant submits the pending claims are distinguished from Odiaka.

a. It is admitted in the Final Office Action that Odiaka does not disclose:

1. a hierarchical arrangement of the one or more common blocks of policy statements within the routing policy (Final Office Action, pg. 3);
2. policy statements being an attribute-operator pairing (Final Office Action, pg. 4); and
3. operands in policy statements (Final Office Action, pg. 4).

b. Odiaka does not disclose:

1. at least one policy statement in the common blocks of policy statements being an attribute-operator pairing wherein the operator is a set operator for setting the attribute to a particular value; and
2. compiling the parameterized routing policy.

B. Applicant submits the pending claims are distinguished from Brawn.

a. It is admitted in the Final Office Action that Brawn does not disclose:

1. policy statements being an attribute-operator pairing (Final Office Action, pg. 4).

b. Brawn does not disclose:

1. at least one policy statement in the common blocks of policy statements being an attribute-operator pairing wherein the operator is a set operator for setting the attribute to a particular value; and
2. compiling the parameterized routing policy.

C. Applicant submits the pending claims are distinguished from Naveh.

a. Naveh does not disclose:

1. at least one policy statement in the common blocks of policy statements being an attribute-operator pairing wherein the operator is a set operator for setting the attribute to a particular value. Naveh describes adding application-specific parameters to a policy repository either manually or via LDAP, not using a set operator as claimed (see Naveh, col. 9, lines 29-40); and
2. compiling the parameterized routing policy. Naveh describes implementing the policy repository as a table or information tree, not as a compilable parameterized routing policy (see Naveh, col. 9, lines 14-17). The compilable aspect of the claimed embodiments is supported in the originally-filed specification at least at page 11, lines 5-12 and page 14, lines 7-12.

Detailed Argument

The Rejection of Claims Under § 103

Claims 1-50 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Odiaka (US Pat. 6,829,347) in view of Brawn et al. (US Pat. 7,020,718), hereafter "Brawn" and in further view of Naveh et al. (US Pat. 6,466,984), hereafter "Naveh."

Applicant respectfully submits that the Office Action did not make out a *prima facie* case of obviousness for at least the following reasons. Even if combined, the cited references fail to teach or suggest all elements of the claimed embodiments.

The Applicant respectfully submits that Odiaka does not disclose or suggest the method, apparatus, or system as claimed. The data fields and values in Odiaka have no associated action or operator to be applied to the data fields and values. In contrast, the claimed policy statements include at least one policy statement in the common blocks of policy statements that is an attribute-operator pairing. This aspect of the claimed embodiments is taught in the originally filed specification at pages 2-3. Thus, the policy statements as claimed are not mere data; the claimed policy statements include at least one attribute-operator pairing policy statement. This is a patentable distinction relative to Odiaka. Additionally, the common blocks of policy statements as currently claimed are re-usable constructs that can be used with different sets of parameters.

Odiaka does not disclose or suggest a method, apparatus, or system to parameterize a routing policy, wherein the parameterizing includes identifying one or more common blocks of policy statements within the routing policy, at least one policy statement in the common blocks of policy statements being an attribute-operator pairing, the common blocks of policy statements sharing a similar structure, assigning sets of parameters to elements of the one or more common blocks, at least one common block being re-used with a different assigned set of parameters, and enabling a hierarchical arrangement of the one or more common blocks of policy statements within the routing policy as currently claimed (e.g., see claims 1, 14, 27, and 40). Odiaka does not disclose or suggest identifying common blocks of policy statements, wherein at least one policy statement in the common blocks of policy statements is an attribute-operator pairing. Odiaka does not disclose or suggest maintaining common blocks that can be re-used with a different set of parameters. This is clearly different that merely maintaining data fields and

values as in Odiaka. Further, as admitted in the Final Office Action, Odiaka does not disclose or suggest a hierarchical arrangement of common blocks of policy statements within the routing policy (Final Office Action, pg. 3); Odiaka does not disclose or suggest policy statements being an attribute-operator pairing (Final Office Action, pg. 4); and Odiaka does not disclose or suggest operands in policy statements (Final Office Action, pg. 4). As such, Odiaka does not teach or suggest the presently claimed embodiments of claims 1-50.

Brawn describes a method of creating a discontinuous address plan for an enterprise. The method includes determining a hierarchy of routing optimization for an enterprise, determining a number of route advertisement aggregation points at each level of the hierarchy, determining a number of network security policy areas for the enterprise, and determining a number of addresses for each of the network security policy areas. However, Brawn does not disclose or suggest the elements missing from Odiaka as explained above. In particular, Brawn does not disclose or suggest a method, apparatus, or system to parameterize a routing policy, wherein the parameterizing includes identifying one or more common blocks of policy statements within the routing policy, at least one policy statement in the common blocks of policy statements being an attribute-operator pairing, the common blocks of policy statements sharing a similar structure, assigning sets of parameters to elements of the one or more common blocks, at least one common block being re-used with a different assigned set of parameters, and enabling a hierarchical arrangement of the one or more common blocks of policy statements within the routing policy as currently claimed (e.g., see amended claims 1, 14, 27, and 40). Brawn also does not disclose or suggest a method, apparatus, or system including compiling the parameterized routing policy. The compilable aspect of the claimed embodiments is supported in the originally-filed specification at least at page 11, lines 5-12 and page 14, lines 7-12. As such, Brawn does not teach or suggest the presently claimed embodiments of claims 1-50.

Naveh does not disclose at least one policy statement in the common blocks of policy statements being an attribute-operator pairing wherein the operator is a set operator for setting the attribute to a particular value. Naveh describes adding application-specific parameters to a policy repository either manually or via LDAP, not using a set operator as claimed (see Naveh, col. 9, lines 29-40). Further, Naveh does not disclose compiling the parameterized routing policy.

Naveh describes implementing the policy repository as a table or information tree, not as a compilable parameterized routing policy (see Naveh, col. 9, lines 14-17).

Thus, Odiaka alone or in combination with Brawn and/or Naveh does not render obvious the presently claimed embodiments. The Applicant respectfully requests withdrawal of the §103(a) rejections.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone the undersigned at (408) 406-4855 to facilitate prosecution of this application.

If necessary, please charge any additional fees or deficiencies, or credit any overpayments to Deposit Account No. 19-0743.

Respectfully submitted,

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By



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